

**Attachment E                      Additional Comments on Appendix 1**  
**Minimum Technical Requirements for New Development and Redevelopment**

Page 2 CESCL Definition:    Add option of being certified through CPESC (Certified Professionals in Erosion and Sediment Control) program. Program website is <http://www.cpesc.net>.

Page 3 New Development and Land Disturbing Activities: Need an exemption from the definitions for environmental restoration activities and projects. Provide the same exemption as the installation of underground utilities.

Page 4 Defining Unfenced Fire Lanes as PGIS: Delete fire lanes from PGIS definition; by including fire lanes as a PGIS, applicants will want to fence and barricade them; interfering with their use in emergencies. They receive very little use except in emergencies.

Page 4-5 Definition of "Project Site" and "Site:" The words are so similar that it can become confusing. Also see "Threshold Discharge Area definition: "...onsite area.... Does this pertain only to the "project site" or the "site?"

Page 12 Establish Construction Access:        a. "access limited to one route" - say ingress and egress routes need appropriate BMP to avoid tracking mud and dirt out on to the traveled right-of-way.

Page 13, 5. Stabilize Soils:        d. suggest considering some wording like "when there is the likelihood of measurable precipitation (0.1 inch or more), disturbed soils and stockpiles shall be protected from erosion."

Page 14, 6. Protected Slopes: d. Change wording to "Excavated material should be placed on the uphill slope..." Trench safety should be primary concern and adding fill to the upslope side of a trench increases hazard to workers in the trench.